

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
KENNETH EARL DAVIS)	Case No. 22-32971-KLP
PAMELA JANET JACKSON)	Chapter 13
)	
Debtors)	
)	
U.S. BANK NATIONAL ASSOCIATION)	
)	
Movant)	
)	
v.)	
)	
KENNETH EARL DAVIS, et al.)	
)	
Respondents)	

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COME NOW the Debtors, by counsel, and as and for Debtors' Response to the above styled Motion for Relief From the Automatic Stay ("Motion"), state as follows:

1. The allegations contained in paragraphs 1, 2, 3, 4, and 5 of the Motion are admitted.
2. The allegations contained in paragraph 8 of the Motion are admitted in part and denied in part.
3. The allegations contained in paragraphs 10, 11, 12, and 13 of the Motion are denied as phrased and Debtors demand strict proof thereof.

James E. Kane (VSB #30081)
Jason E. Kane (VSB #96448)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com
Counsel for Debtors

4. Counsel for the Debtors has not yet received a response from the Debtors in connection with the Motion and is without sufficient information to admit or deny the allegations contained in paragraphs 6, 7 and 9 of the Motion and, in order to preserve the rights of the Debtors, denies the same.

WHEREFORE, the Debtors respectfully request that the Motion for Relief From the Automatic Stay be denied, and for such other relief as the Court deems appropriate.

KENNETH EARL DAVIS
PAMELA JANET JACKSON

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
Jason E. Kane (VSB #96448)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2023, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof.

/s/ James E. Kane

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
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Richmond, Virginia 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com